

GARRITY, GRAHAM, FAVETTA & FLINN

A Professional Corporation

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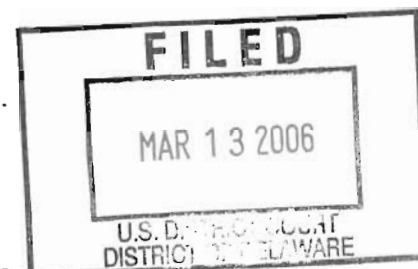
Telephone: 973-509-7500

Attorneys for Plaintiff, Hanover Insurance Company

Our File No. 450.17737/FXG 05-230

HANOVER INSURANCE COMPANY,	:	UNITED STATES DISTRICT COURT
	:	FOR THE DISTRICT OF NEW JERSEY
Plaintiff,	:	
	:	Civil Action No.: 05-1591(JWB)
vs.	:	
	:	<u>Civil Action</u>
CANAL INSURANCE COMPANY	:	
	:	NOTICE TO TAKE ORAL
Defendant.	:	DEPOSITIONS
	:	

TO: Ted Flowers, Esq.
Segal, McCambridge, Singer & Mahoney, Ltd.
United Plaza
30 S. 17th Street
Suite 1700
Philadelphia, PA 19103
Attorneys for Defendant, Canal Insurance Company



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SIRS:

PLEASE TAKE NOTICE that in accordance with the Federal Rules of Civil Procedure, testimony will be taken by deposition upon oral examination before a person authorized by the laws of the State of New Jersey to administer oaths on **March 31, 2006** at **1:00 p.m.** at the offices of **Garrity, Graham, Favetta & Flinn, One Lackawanna Plaza, Montclair, New Jersey**, with respect to all matters relevant to the subject matter involved in this action, at which time and place the testimony of the following persons will be taken:

MELISSA SMITH, LINDA MILLIGAN, AND AN EMPLOYEE OF
CANAL INSURANCE COMPANY HAVING THE MOST
KNOWLEDGE OF THE UNDERWRITING OF INSURANCE BY
CANAL INSURANCE COMPANY FOR CHRISTIANA MOTOR FREIGHT, INC. AND
HAVING THE MOST KNOWLEDGE OF AFFORDING COVERAGE TO
OWNER-OPERATORS LEASING VEHICLES TO CHRISTIANA
MOTOR FREIGHT AND AFFORDING COVERAGE FOR THEIR VEHICLES

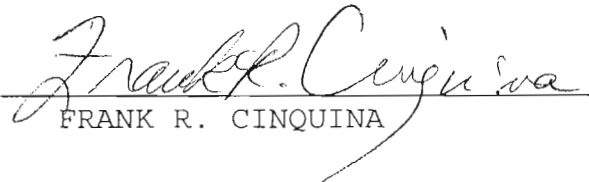
He/she are to bring with them the following documents:

1. All underwriting files, insurance applications, and all motor vehicle insurance policies issued to Christiana Motor Freight since Canal began writing insurance for said insured.
2. Any and all documents indicating the ownership, license plate numbers, VIN Numbers and other information concerning any vehicles insured under any Canal policy issued to Christiana Motor Freight between January 1, 2001 and January 1, 2004.
3. Any and all documents in any way relating to any vehicles which were specifically named on Canal policy number 395905, including information concerning the ownership of said vehicles, their VIN Numbers, license plate numbers, as well as any title documents, registrations or other documents relating to the ownership of said vehicles.
4. Any and all trip leases or other leases pursuant to which Sherman Dunn was to operate vehicles on behalf of Christiana Motor Freight, Inc.
5. Any and all documents terminating any leases pursuant to which Sherman Dunn was to operate vehicles on behalf of Christiana Motor Freight, Inc., including, but not limited to, any and all documents relating to the lease and/or termination of the lease of a 1993 Freightliner tractor bearing VIN No.: 2FUVDXYB4PA416131.
6. Any and all documents relating to the deletion of the aforesaid 1993 Freightliner tractor bearing VIN No.: 2FUVDXYB4PA416131 from the Canal policy number 395905 effective November 1, 2003.
7. Any and all correspondence between Canal Insurance Company and any insurance brokers or agents concerning any policy of motor vehicle insurance issued at any time by Canal Insurance Company to Christiana Motor Freight, Inc. and concerning any vehicles to be insured under said policies.

8. Any and all documents indicating which vehicles were insured by Canal Insurance Company under its policy 395905 as of October 17, 2003.
9. Any and all documents, including title certificates, registrations, documents relating to VIN Numbers or license plate numbers of the tractor and trailer which were being used by Sherman Dunn on October 17, 2003 and which were at the premises of NCS Enterprises, Millville, New Jersey, on October 17, 2003.
10. Any and all correspondence between Canal Insurance Company and Pratt Insurance Inc. in any way relating to Christiana Motor Freight Inc., or any policies of insurance issued by Canal Insurance Company to Christiana Motor Freight Inc.
11. Any and all documents relating to the operation of Christiana Motor Freight Inc. as an I.C.C. carrier.
12. Any and all documents referring to the I.C.C. number and/or decals of Christiana Motor Freight Inc.
13. Any and all documents relating to the decals, signage or other information on the tractor being used by Sherman Dunn on October 7, 2003, as to specifically what information was contained on Mr. Dunn's tractor, including the name and address of Christiana Motor Freight Inc., its I.C.C. number or any other information concerning same.
14. Any and all documents in any way relating to the underwriting of Christiana Motor Freight Inc. by Canal Insurance Company at any time.
15. Any and all documents regarding the addition or deletion of any vehicles on any policy of automobile, trucks or other motor vehicle insurance issued by Canal Insurance Company to Christiana Motor Freight, Inc. between January 1, 2000 and January 1, 2004.
16. Any and all documents relating to the record retention policy of Canal Insurance Company as to when documents are to be disposed of including, but not limited to, insurance applications, underwriting files and the like.
17. Any and all documents relating to the present whereabouts of the underwriting file for Christiana Motor Freight Inc.

18. Any and all documents relating to the destruction and/or disposal of the underwriting file for Christiana Motor Freight Inc.
19. Any and all documents relating to the premiums charged by Canal to Christiana Motor Freight, Inc. for motor vehicle coverage.
20. Any and all agency agreements or other agreements or contracts between Canal Insurance Company and Pratt Insurance Services in effect at any time between January 1, 2000 and the present.
21. Any and all reports, surveys, correspondence or other communications, involving CPCS, a division of Choicepoint, regarding Christiana Motor Freight, including but not limited to, a survey by CPCS dated December 10, 2002 concerning Christiana Motor Freight, from January 1, 2000 to the present.
22. Any and all documents relating to the present and/or last known address and telephone number of Melissa Smith.
23. Any and all documents relating to the present and/or last known address and telephone number of Linda Milligan.

GARRITY, GRAHAM, FAVETTA & FLINN
Attorneys for Plaintiff, Hanover
Insurance Company

BY: 
FRANK R. CINQUINA

Dated: March 8, 2006

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